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Rachel Perillo

January 16, 2026

**By ECF**

Hon. Nusrat J. Choudhury  
United States District Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: United States v. Michael Jeffries, et al.,  
Including JAMES T. JACOBSON  
24 Cr. 423 (NJC)

Dear Judge Choudhury:

I represent James Jacobson, the defendant in the above-named matter, who is currently on Pretrial Release and subject to home detention at his residence in Wisconsin. This letter is respectfully submitted with the consent of Pretrial Services and the government to request a bail modification that would eliminate the condition of home detention and impose the condition of stand-alone monitoring.

Mr. Jacobson has been on Pretrial Release since October 25, 2024. His conditions of release include home detention with location monitoring; travel restricted to New York City, Long Island, the Western District of Wisconsin, and the District of Minnesota; surrender of his passport; reporting to Pretrial Services; mental health evaluation and mental health treatment as directed by Pretrial Services; refraining from possession of firearms; refraining from contact with victims, witnesses, and co-defendants (outside the presence of counsel); and maintaining residence as approved by Pretrial Services.

I have conferred with Mr. Jacobson's Pretrial Services Officer in the Eastern District of New York, Mallori Brady, as well as his Pretrial Services Officer in Wisconsin, Kyle Severson, both of whom inform me that Mr. Jacobson has maintained full compliance with his conditions of pretrial release. Because Mr. Jacobson is not scheduled for trial until October, and because he has been compliant with his bail conditions for over year, it is respectfully requested that the condition of home detention be removed, and that Mr. Jacobson be placed on stand-alone

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monitoring. With this modification Mr. Jacobson would still have an electronic monitoring bracelet and remains subject to the travel restrictions in his bail order. Pretrial Services consents to this request. The government, by AUSA Megan Farrell, also consents to this request.

If the Court has any questions regarding this application, please do not hesitate to contact me.

Respectfully submitted,  
/s/  
Jeremy Schneider

cc: AUSA Megan Farrell (by ECF)  
AUSA Erin Reid (ECF)  
Pretrial Services Officer Mallori Brady (by Email)  
Pretrial Services Officer Kyle Severson (by Email)